



PROGRESS REPORT NO. 32

TO: Kevin Rochlin – U.S. Environmental Protection Agency (EPA) - via Email

FROM: Marko Adzic – Teck American Incorporated (Teck)

CC: David Godlewski – Teck (via Email)

DATE: March 13, 2009

FILE NO: 1-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 32 Month Ending February 2009

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Upon receiving confirmation that the Quality Assurance Project Plan (QAPP) for the 2009 Beach Sediment Study and associated Cultural Resources Coordination Plan were approved, copies were forwarded to the U.S. Department of the Interior (DOI), National Park Service to facilitate issuance of the Special Use Permit.

Based on communications with the Confederated Tribes of the Colville Reservation (CCT), we understand that the access agreement between Teck and the CCT will be presented to the Council's Natural Resources Committee on March 17th, and then to the full Tribal Council on the 19th. In light of the aforementioned schedule, Teck will continue to work with the CCT ensuring that a research application for beach sediment sampling activities is submitted to Council for review and approval on the 19th of March as well.

With approval of the beach sediment sampling plan, an application to obtain a ground disturbance permit was submitted to the Spokane Tribe of Indians (STI) on March 12th. Over the next several weeks, Teck will work with the STI to ensure that cultural resource observers are available for the beach sediment sampling program. In addition to the above mentioned, Teck has also been following-up with the State Department of Natural Resources, and private land owners regarding beach sediment sampling activities.

A summary of activities (e.g., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status ^{1.}	Issues	Estimated Completion Date ²
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum ^{3.}	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	Draft submitted	None to report at this time	<u>December 28, 2006</u>
4.	Sampling and Analysis Plan (SAP) ^{4.}	Draft submitted	None to report at this time	<u>February 26, 2007</u>
5.	Health and Safety Plan	Complete	None to report at this time EPA does not approve Health and Safety Plans	<u>February 26, 2007</u>
6.	Cultural Resources Coordination Plan ^{5.}	Draft submitted	None to report at this time	<u>February 26, 2007</u>
7.	Revised RMAO Memorandum ^{6.}	Complete	None to report at this time	<u>March 11, 2007</u>
8.	Additional Trail Data	Complete	None to report at this time	<u>May 6, 2007 ^{7.}</u>
9.	April Workshop Summary	Complete	None to report at this time	<u>July 12, 2007</u>
10.	Revised RI/FS Work Plan ^{8.}	Complete ^{9.}	None to report at this time	<u>September 21, 2007</u>
11.	Screening Level ERA	Interim Draft submitted	None to report at this time	<u>March 11, 2008</u>
11.	SLERA	Draft submitted (Step 5)	None to report at this time	<u>December 5, 2008</u>
12.	White Sturgeon Surface Water Toxicity SAP ^{10.}	Complete	None to report at this time	<u>May 26, 2008</u>
13.	Surface Water SAP	Draft submitted (Step 5) ^{11.}	None to report at this time	<u>July 18, 2008</u>
14.	Fish Tissue SAP	Draft submitted (Step 5) ^{11.}	None to report at this time	<u>July 18, 2008</u>
15.	Phase 2 Beach SAP	Comments Received (Step 10)	None to report at this time	<u>August 1, 2008</u>
16.	BERA Work Plan	Ongoing	None to report at this time	<u>May 1, 2009</u>
17.	Phase 2 Beach SAP (includes Cultural Resources Coordination Plan)	Approved; Complete (Step 15)	None to report at this time	<u>February 26, 2009 ^{12.}</u>
18.	White Sturgeon 2009 Toxicity Testing	Step 1 ^{13.}	None to report at this time	<u>March 2009</u>

- Notes:
1. In July 2008 EPA in association with the participating parties developed a UCR-specific 15-step process flow outline to review technical deliverables. In recognition of the aforementioned review process, 'Steps' as laid-out and defined on July 9, 2008 are employed herein.
 2. Dates that have been underlined represent the actual day the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.
 3. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.
 4. The *2007 Sediment Investigation of Beaches and Depositional Areas* sampling and analysis plan submitted under Paragraph 13 of the Agreement was disapproved in a letter dated June 20, 2008 (received on June 24, 2008) with revisions due no later than August 25, 2008. The revised document was submitted ahead of schedule on August 1, 2008.
 5. Further to EPA's September 19, 2007 letter informing Teck that the February 2007 cultural resource coordination plan (the plan) would require revisions. EPA disapproved the plan and in a letter dated July 3, 2008 (received on July 7, 2008), requested that a revised plan be submitted with each quality assurance project plan. A revised plan was submitted with the 2008/2009 Surface Water Study (Item No. 13), the 2008 Fish Tissue Study (Item No. 14), and the 2008/2009 Beach Sediment Study (Item No. 15). Comments on the plan (as attached and included as part of Item No. 15) were received on February 2, 2009.
 6. The draft technical memorandum on risk-based management action objectives (RMAOs) was revised per EPA's January 16, 2007 comments.
 7. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007) Teck has compiled additional information on the Trail Facility so as to assist in the identification of chemicals of interest (COIs) as outlined within Paragraph 24 of the Agreement. An electronic version of the deliverable was forwarded to EPA on May 6, 2007 with hard copies delivered shortly thereafter. In addition, a second deliverable identified as "Business Confidential" information was submitted to EPA legal counsel under separate cover on May 7, 2007 by Pillsbury Winthrop Shaw Pittman (i.e., Teck legal counsel) on behalf of Teck.
 8. An electronic copy of the draft RI/FS work plan has been provided to facilitate modifications of the document by EPA. It is anticipated that both EPA and Teck will be in a position to finalize this document in the near future.
 9. On December 31, 2008 the RI/FS work plan, as modified by EPA, was approved.
 10. As noted during the March 2008 technical workshop, the draft SAP is for work being conducted in Canada and will be provided to EPA for informational purposes. Results of the study will be treated in a similar matter as other peer reviewed papers. Preliminary results will be presented at the 2008 Annual Society of Environmental Toxicology and Chemistry (SETAC).
 11. A draft 2008 Plankton Study was appended to the draft study plan.
 12. Following receipt of the approval letter on March 5, 2005 (facsimile) the approved document was distributed per the document distribution list on March 13, 2009.
 13. It is anticipated that in light of the information gained, and institutional knowledge developed from the Canadian based 2008 field studies, similar studies can be efficiently completed within the Site in 2009. Although Steps 2-4 have not yet been completed Teck's technical team is working on preparing the draft Quality Assurance Project Plan.
 14. ERA = Ecological Risk Assessment
SAP = Sampling & Analysis Plan
BERA – Baseline Ecological Risk Assessment

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.